**BEFORE THE POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001**

Postal Rate and Fee Changes, 2006   **Docket No. R2006-1**

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF PITNEY BOWES INC. TO UNITED STATES POSTAL SERVICE WITNESS RICHARD G. LOUTSCH (PB/USPS-T6-1-4)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate

Commission, Pitney Bowes Inc. ("Pitney Bowes") directs the following interrogatories

and requests for production of documents to United States Postal Service Witness

Richard G. Loutsch. If the witness cannot answer a question or subpart, we request that

the Postal Service answer through another witness or submit an institutional response.

Respectfully submitted,

_____/s/_____

James Pierce Myers
Attorney at Law
1211 Connecticut Avenue, NW
Suite 610
Washington, DC 20036
Telephone: (202) 331-8315
Facsimile: (202) 331-8318
E-Mail: jpm@piercemyers.com

Michael F. Scanlon
PRESTON GATES ELLIS &
ROUVELAS MEEDS LLP
1735 New York Avenue, NW
Washington, DC 20006
Telephone: (202) 628-1700
Facsimile: (202) 331-1024
E-Mail: mscanlon@prestongates.com

Counsel to PITNEY BOWES INC.

DATED: June 22, 2006

PB/USPS-T6-1.   Please confirm that the need for a contingency could be caused by Test Year After Rates ("TYAR") costs higher than those predicted by the Postal Service. If you cannot confirm, please explain fully.

PB/USPS-T6-2.   Please confirm that the need for a contingency could be caused by TYAR revenues lower than those predicted by the Postal Service. If you cannot confirm, please explain fully.

PB/USPS-T6-3.   Please confirm that to provide an "adequate contingency" which is "essential to achieving financial stability and long-run break even" you have included a contingency of $767 million in TYAR, which effectively increases estimated TYAR costs by 1 percent. If you cannot confirm, please explain fully.

PB/USPS-T6-4.   Please confirm that the costs of the unforeseen and unforeseeable events that create the need for the contingency will be randomly distributed across cost segments and components. If you cannot confirm, please explain fully.